

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
·Caption in Compliance with D.N.J. LBR 9004-1(b)
McNALLY & ASSOCIATES, L.L.C.
93 Main Street, Suite 201
Newton, New Jersey 07860
(973) 300-4260
Attorneys for TTLREO, LLC

In Re:

LORI N. LEWKOWITZ,

Debtor.

Case No.: 18-26130

Chapter: 13

Hearing Date: 8/18/2020

Judge: Kaplan

**NOTICE OF MOTION FOR LEAVE TO FILE AN UNTIMELY
PROOF OF CLAIM PURSUANT TO BANKRUPTCY RULE 9006(b)(1)**

To: Albert Russo
Standing Chapter 13 Trustee
CN 4853
Trenton, New Jersey 08650

Joseph Casello
Collins, Vella & Casello
2317 Route 34 South
Suite 1A
Manasquan, New Jersey 08736

PLEASE TAKE NOTICE that on the 18th day of August, 2020 at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned McNally & Associates, L.L.C., counsel for TTLREO, LLC, shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey 08608 for the entry of an Order Granting Leave to File an Untimely Proof of Claim Pursuant to F.R.B.P. Rule 9006(b)(1); and

PLEASE TAKE FURTHER NOTICE that the facts and law that TTLREO, LLC rely upon are set forth in the accompanying Certification of Stephen McNally in Support of Entry of an Order Granting Leave to File an Untimely Proof of Claim Pursuant to F.R.B.P. Rule 9006(b)(1), and do not present complicated questions of fact or unique questions of law, so it is hereby submitted that no brief is necessary for the Court's consideration of the within motion; and

PLEASE TAKE FURTHER NOTICE that oral argument is not requested.

Dated: Newton, New Jersey
July 27, 2020

McNALLY & ASSOCIATES, L.L.C.
93 Main Street
Newton, New Jersey 07860
(973) 300-4260
Attorneys for TTLREO, LLC

By: /s/ Stephen McNally
Stephen B. McNally